

Statement from Jim Coleman, NATE Chairman

November 17, 2011

NATE Executives were unable to participate in the on-air PBS FRONTLINE segment and in the interest of fair, balanced and accurate journalism; I wanted to address some of the issues that were raised in the email dated November 7, 2011. In NATE's view, it's not the format of the organization's participation that we believe is important, rather the content of our participation to viewers and readership, to understand.

NATE's Impact on Tower Industry, Safety of Climbers

Early in the wireless industry's evolution, many realized the need for uniform safety practices and an organization to champion these practices for the well-being of everyone involved. From this belief, nearly 60 tower companies came together to collaborate and share their concerns and soon after, the National Association of Tower Erectors was founded in 1995. From the beginning, it was NATE's goal to create a culture of safety among the broadcast and telecommunications industries. Our organization started as a way for members to collaborate on safety practices and elevate the safety standards in the industry to protect its workers.

Today with more than 600 members, NATE serves a number of roles, including providing consistent training and resources, helping develop federal regulations and facilitating an open dialogue among across the tower industry – from carriers and general contractors to tower companies and their employees. Currently, NATE has several important programs in place to increase the safety of our members, including:

- NATE STAR Initiative
- Qualified Climber Evaluation Checklist and the Tower Owner Safety Checklist
- NATE Tower Climber Fall Protection Training Standard (NATE CTS)
- NATE Accident Prevention, Safety & Health Program Guide
- NATE Tower Site Hazard Recognition Guide
- NATE Hoist Operator's Educational Requirements Guide
- Tower Signals and Communication Guide
- Roof Top Safety Protocol manual
- Site Signage materials
- RF Awareness Guide
- Tower climber training guidelines
- Training courses held during our annual conference and exhibition
- Videos on best practices regarding Personnel Hoisting, Gin Pole Procedures and RF Awareness
- And many other resources to help our members be as safe as possible

There is no question that challenges exist with the broader goal of sending every tower climber home safely every day. Add to this tight schedules imposed upon our members, ever tightening budgets and the impact of seasonal work – all place added pressure on tower crews that can lead to an increase of accidents. Safety isn't just the responsibility of any one entity. The entire ecosystem must make safety a priority and central to how to conduct business. NATE works

closely with any party that will lend us its ears to share our view that safety is important not only for the health and safety of tower workers, but also for our nation's competitiveness, our communications capabilities, our homeland security and to meet the widely recognized goal of expanding broadband.

NATE strictly focuses on safety and quality, and we don't take any role or position on our member's business or operations, such as pricing, labor relations or territorial collusion.

History of the relationship with OSHA and where it stands today

Years ago, NATE and OSHA had an adversarial relationship; however, as a result of extensive negotiations with the agency in the late 1990s, our two organizations forged a closer working, professional relationship. Subsequently, we achieved January 1999 implementation of a landmark policy directive, which permitted broadcast and telecommunications tower workers to access their work stations in a safer, more efficient manner through a technique known as "riding the line." This directive was later revised in a manner advocated by NATE following further negotiations. Since then, we have continued to work closely with OSHA headquarters and field offices, to our mutual benefit.

In 2006, NATE and OSHA formed a national OSHA Strategic Partnership with the purpose of working together to educate and promote safety and health in the tower industry. Specific goals of this partnership included: reducing the percentage of injuries, illnesses, and fatalities of NATE-OSHA Partnership participants (and their subcontractors); attaining aggregate injury and illness rates that are below the Bureau of Labor Statistics' national average for this industry; and improving safety awareness of key industry hazards to help prevent accidents at the worksites. In return, NATE-OSHA Partnership members were accorded recognition for their commitment and accessed reduced fees if they were not in full compliance of OSHA regulations.

In 2009, OSHA proposed changes in all cooperative programs and as a result NATE could not to renew the partnership under the revised terms. In the absence of this partnership, NATE created the NATE STAR Initiative to help its members to continue to be recognized for holding safety above all else and making an ongoing investment in strict safety procedures and standards.

Regardless of the decision to end the NATE-OSHA Partnership, NATE continues to work with OSHA, especially on efforts to modify the riding the line directive issue to include maintenance. In June 2010, top NATE officials met with OSHA and were told explicitly that addressing this matter is a top agency priority. Unfortunately, it does not appear that OSHA has done much in this regard since this meeting.

NATE's ongoing dialogue and collaboration within the ecosystem

Both NATE's board of directors and the industry relations committee are in constant discussions with carriers, general contractors, tower subcontractors, tower erectors, operators and owners to gain insight into current affairs within the tower industry and how to improve safety awareness across the ecosystem.

NATE regularly collaborates with other industry organizations to help bolster our efforts. For example, NATE members have spent years working with the Telecommunications Industry Association (TIA) on Revision G of the tower structural standards - TIA 222g and drove the development of TIA gin pole standard - TIA 1019. NATE has also worked with the American National Standards Institute's (ANSI), the American Society of Safety Engineers (ASSE), PCIA, NAB and CTIA - the Wireless Association - on a number of regulatory matters. NATE and its members have also made safety presentations to State Wireless Associations across the country to reach regional wireless executives and presentations at several the National Safety Council conferences.

What must be done to ensure that qualified contractors are being used

In a word, it's commitment. Commitment from the entire tower ecosystem to ensure that safety and quality are maintained at all times.

First, you have to understand what constitutes a qualified contractor. Qualified contractors are committed to doing the job right the first time, providing a quality product with high reliability and view the job as more than just a contract on a piece of paper. These are companies that go above and beyond minimum training guidelines, provide quality installations and safe work environments; they require minimal oversight from management and reduce the need for return trips to correct installation issues. Qualified contractors know that compromising safety or quality ultimately take more time and cost more money in the long run. No amount of money is worth putting someone's life at risk. These dedicated contractors routinely maintain high quality safety programs to manage their employees and produce site-specific safety plans for each job and actively take part in safety training activities.

Quality, training and experience are three key ingredients needed to produce quality work on the jobsite and, without one of those ingredients, the result falls short. Contractors that do not train their employees in the many areas listed above can dramatically underbid qualified contractors and, in almost all cases, provide second-rate work.

Using qualified contractors benefits everyone, from the carriers, broadcaster and contractors to the tower climbers and the actual consumer. With all these benefits, why would anyone use an unqualified contractor? Typically it comes down to cost. NATE works to demonstrate the long-term cost of corner cutting and the costs that will impact everyone involved if corner cutting leads to an accident.